

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
ILLINOIS

SHENZHEN LI YING ELECTRONIC  
TECHNOLOGY CO., LTD.

Plaintiff,

V.

THE PARTNERSHIPS, et al.,

Defendants.

Case No. 1:23-cv-0244

Hon. John Robert Blakey

SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR  
OTHERWISE PLEAD

COME NOW Defendants audiogalaxy, premiumwire, valuebuybattery, inkcredibleprinting, and batterymonster (hereinafter referred to as “Moving Defendants”), by and through counsel, and pursuant to Federal Rule of Civil Procedure Pursuant to FRCP 6(b)(1)(B) and respectfully move this Court for an extension of time to answer or otherwise plead, showing the Court as follows:

1. Plaintiff filed its Complaint on January 17, 2023 . [ECF No. 1]
2. The parties previously agreed to an extension of time through April 7, 2023. The Court entered an Order granting that extension on March 9, 2023. [ECF No. 53]
3. The parties have used this time wisely and have reached a settlement in principle. The parties are negotiating the terms of the agreement and respectfully request that the Court enter an Order extending the deadline for Moving Defendants to answer or otherwise plead to allow time for the parties to work to finalize a settlement.
4. Counsel for Moving Defendants conferred via email with Depeng Bi, counsel for

Plaintiff, and the parties have agreed to an extension of time for Moving Defendants to answer or otherwise plead through April 28, 2023.

5. This extension of time is not being sought for the purpose of delay or frustration of the progress of this matter.
6. This extension will not unduly burden Plaintiff or Moving Defendants.

WHEREFORE, Defendants audiogalaxy, premiumwire, valuebuybattery, inkcredibleprinting, and batterymonster respectfully request that this Court grant their Second Unopposed Motion for Extension of Time to Answer or Otherwise Plead and order them to file their responsive pleading no later than Friday April 28, 2023.

Respectfully submitted,

/s/ Erin K. Russell  
The Russell Firm, LLC  
833 W. Chicago Avenue, Suite 508  
Chicago, IL 60642  
T: 312-994-2424  
F: 312-706-9766  
erin@russellfirmip.com

CERTIFICATE OF  
SERVICE

This is to certify that on April 18, 2023, this document was filed with the Court via the CM/ECF electronic filing system, thereby serving it upon all counsel of record.

/s/ Erin K. Russell